

THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION

IN RE: : CHAPTER 13
KEIRI YENNISEL CONCEPCION :
: :
Debtor(s) : CASE NO. 5-21-02432

OBJECTION TO CERTIFICATION OF DEFAULT

NOW COMES, Keiri Yennisel Concepcion, the above Debtor, by and through their counsel, Tullio DeLuca, Esq., and files this Objection to Certification of Default and states the following:

1. On July 17, 2023, a Motion to Dismiss due to material default was filed.
2. On June 14, 2024, Jack N. Zaharopoulos, Esq. filed a Certificate of Default stating that the Debtor has failed to cure the arrears.
3. Debtor's Counsel is in the process of contacting the Debtor to ascertain if the payments have been made and/or if Debtor is in possession of funds needed to cure the arrears.
4. The Debtor requests that a hearing be scheduled on the Objection to the Certificate of Default.

WHEREFORE, the Debtor respectfully requests that this Honorable Court sustain the Objection to the Certification of Default and deny the dismissal of the Chapter 13 Case.

Respectfully submitted,

Date: June 16, 2024

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID #59887
Counsel for Debtor
381 N. 9th Avenue
Scranton, Pa 18504

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 16, 2024, he caused a true and correct copy of Debtor's Objection to Certification of Default to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pAMD13trustee.com

Date of Mailing: June 16, 2024 /s/Tullio DeLuca
Tullio DeLuca, Esquire